

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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:
UNITED STATES OF AMERICA :
:
v. : No. 18 CR 48
:
EDWARD BASES and : Judge John Z. Lee
JOHN PACILIO, :
:
Defendants. :
-----x

**UNOPPOSED JOINT MOTION FOR LEAVE TO
WAIVE INDIVIDUAL DEFENDANT APPEARANCES**

Defendants Edward Bases and John Pacilio, by and through their undersigned counsel, respectfully move the Court for the entry of an Order permitting each of them to waive his appearance at the status hearing on July 9, 2019 (the “Proceeding”). Counsel for the defendants have conferred with counsel for the government, who consent to the waiver of Mr. Bases’ and Mr. Pacilio’s appearances at the Proceeding.

In making this request, each defendant understands the seriousness of the charges and the importance of proceedings before the Court. As the Court is aware, however, each defendant resides in Connecticut and would have to travel to Chicago in order to attend the Proceeding, which is relatively non-substantive in nature.

Prior to making this motion, undersigned counsel informed each defendant that he may attend the Proceeding, and that he has the right to be present at critical stages in his criminal prosecution. In addition, counsel has explained the advantages of being present and the disadvantages of being absent from court proceedings related to his case. Having consulted fully

with counsel, each defendant has informed counsel that he waives any right he may have to be present at the Proceeding.

WHEREFORE, defendants Edward Bases and John Pacilio respectfully request that they be permitted to waive their appearances at the Proceeding.

Dated: June 28, 2019

Respectfully submitted,

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Counsel for Defendant John Pacilio

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CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will provide notice of the filing to counsel for the government.

By: /s/
Sean S. Buckley